



November 10, 2008

Dr. Leah Evison
U. S. EPA - Region 5 (SR-6J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
Monthly Report October 1 – October 31, 2008**

Dear Dr. Evison:

Enclosed is the Sauget Sites Area I Monthly Report for the October 2008 reporting period. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

Steven D. Smith
Project Coordinator

cc: Kevin Turner – USEPA
Sandra Bron - IEPA
Dave Webb - IDPH
Mike Coffey - USF&W
Richard Williams - Solutia
Cathleen Bumb - Solutia
Mayor Frank Bergman - Cahokia, IL
Village of Sauget - c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor R. Sauget - Sauget, IL
Julie Peshkin - Monsanto
Linda Tape - Husch Blackwell Sanders, LLP

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Status Report

Date of Report: November 10, 2008

Period Covered: October 1, 2008 - October 31, 2008

Work Performed during the Reporting Period

Additional comments and a request for additional information regarding the Soil Vapor Intrusion human health evaluation were received from the Agency on September 23rd. The additional information is being collected and will be submitted as soon as available.

A meeting with the Agencies was held on August 19th to discuss the status of the Area 1 EE/CA and RI/FS. A number of action items resulted from the meeting and the status of each of these is as follows:

Summary tables of the residual constituent concentrations in Dead Creek are being prepared and will be submitted to the EPA as part of an Ecological Risk Assessment Addendum (see below).

The EPA undertook to look into alternatives to sub-slab sampling below the Wiese facility on Queeny Avenue. In an e-mail dated September 23rd, the Agency requested additional information on the nature of the chemicals used at the facility. That information is being collected and will be submitted as soon as available.

Solutia undertook to prepare an Ecological Risk Assessment Addendum that describes the derivation of the site specific risk-based concentrations, current residual concentrations in the creek bottom soils, the ecological impact of the groundwater discharge from Sauget Area 1 source areas to the Mississippi River, and update the threatened and endangered species evaluation. That Addendum is in preparation and will be submitted in November.

An outline for the Remedial Investigation (RI) report was to be developed and submitted to the Agency for review. The outline was submitted on October 17th.

CH2M HILL agreed to identify the various alternatives for an oxygen injection system and will prepare a Technical Memorandum identifying the major elements

of a monitored natural attenuation remedial alternative that will satisfy current U.S. EPA guidance. The Tech memo was provided on October 8th.

A follow up meeting is tentatively scheduled for December 11th.

In addition to these, the following documents were either submitted on the indicated date, or are in preparation:

The proposed contents of the Site History portion of the RI report was submitted to the Agency for review on October 7th.

A list of analytes for detailed evaluation in the RI report was submitted on October 7th and was approved by the Agency on October 9th.

A list of proposed ARARs for use in the Feasibility Study was submitted to EPA on October 16th.

The Conceptual Site Model was submitted on October 17th.

The proposed Remedial Action Objectives and a proposed alternative array are being prepared and will be submitted in November.

Removal of DNAPL from well BR-I began on October 14th.

Attachments

There are no Technical Memoranda or data submitted with this report.

Work Scheduled for Next Reporting Period

- Biweekly removal of DNAPL from BR-I pursuant to a request from USEPA.
- Submit the Ecological Risk Assessment Addendum, including the summary tables of the residual constituent concentrations in Dead Creek.
- Submit the proposed Remedial Action Objectives and alternative array to be evaluated in the Feasibility Study.